## KIMBERLY C. TAVARES Attorney & Counselor at Law

955 Coney Island Avenue, Suite 210 Brooklyn, NY 11230 Office: 917.300.8435

E-mail: kcoleman.tavares@gmail.com

Fax:718.310.3183

PLAINTIFF'S FIRST MOTION FOR EXTENSION REQUEST TO FILE PAPERS IN FURTHER SUPPORT OF SUMMARY JUDGMENT MOTION

June 9, 2025

By ECF

Hon. Judge Laura Swain United States District Court Southern District Court of New York 500 Pearl Street New York, NY 10007

## **MEMO ENDORSED**

**RE:** M.K. et al. v New York City Department of Education 1:24 CV-04900 (JHR)

## Dear Judge Swain:

I respectfully write on behalf of Plaintiffs to request a first extension of time to file their papers in further support of their Motion for Summary Judgment and in opposition to Defendant's cross-motion.

Counsel for Plaintiffs was ill over the past weekend and remains indisposed, which has regrettably hindered the preparation of these submissions. I have conferred with Defendant's counsel, Jordan Doll, Esq., who graciously consents to this application.

Accordingly, Plaintiffs respectfully request that:

- 1. The deadline to file their moving papers in further support of summary judgment and opposition to Defendant's cross-motion is extended to June 25, 2025; and
- 2. The deadline for Defendant's reply papers be extended to July 9, 2025.

We appreciate the Court's consideration of this request and stand ready to provide any additional information Your Honor may require.

Respectfully submitted

/s/

Kimberly C. Tavares Counsel for Plaintiffs

Cc: All Counsel of record (via ECF)

The foregoing requested is granted. DE 37 resolved.

SO ORDERED 6/10/2025 /s/ Laura Taylor Swain, Chief USDJ